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UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MAXWELL V.
PRITT IN SUPPORT OF
DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL PRODUCTION
OF DOCUMENTS**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

I, Maxwell V. Pritt, declare as follows:

1. I am counsel at the law firm of Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, “Uber”) in this matter. I am a member in good standing of the Bar of the State of California. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Uber’s Administrative Motion to File Under Seal Exhibits to Their Motion to Compel Production of Documents.

2. I have reviewed the following exhibits and only the portions identified below merit sealing:

| Document | Portions to Be Filed Under Seal | Designating Party |
|--|---------------------------------|-------------------|
| Letter Brief to Compel the Production of Documents | Highlighted Portions | Plaintiff |
| Pritt Declaration ISO Letter Brief to Compel Production of Documents (“Pritt Declaration”) | Highlighted Portions | Plaintiff |
| Exhibit 3 to the Pritt Declaration | Entire Document | Plaintiff |
| Exhibit 4 to the Pritt Declaration | Entire Document | Plaintiff |
| Exhibit 5 to the Pritt Declaration | Entire Document | Plaintiff |
| Exhibit 6 to the Pritt Declaration | Entire Document | Plaintiff |

3. The highlighted portions of the Letter Brief and the Pritt Declaration, and the entirety of Exhibits 3, 4, 5 and 6 to the Pritt Declaration, contain information that I understand Waymo designated or considers to be “Highly Confidential – Attorneys’ Eyes Only” under the Protective Order. Waymo’s counsel asked me to file search terms, custodians, and hit counts under seal.

4. Uber’s request to seal is narrowly tailored to the information Waymo asked to be sealed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of August, 2017 at Oakland, California.

1
2 Dated: August 3, 2017

BOIES SCHILLER FLEXNER LLP

3 By: /s/ Maxwell V. Pritt

4 Maxwell V. Pritt

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7 **ATTESTATION OF E-FILED SIGNATURE**

8 I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this
9 document. In compliance with General Order 45, X.B., I hereby attest that Maxwell V. Pritt has
10 concurred in this filing.

11 Dated: August 3, 2017

12 /s/ Karen L Dunn

13 Karen L. Dunn